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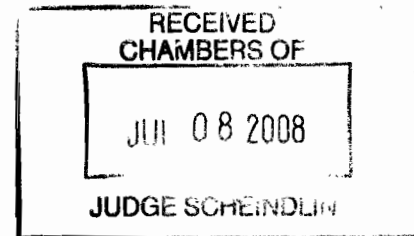
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July 8, 2008

BY FAX: (212) 805-7920

Hon. Shira A. Scheindlin
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007



Re: American Home Assurance Company v.
M/V FEI HE, et al.
Docket No. 08 CV 4847 (SAS)
Our File: 5155

Dear Judge Scheindlin:

We represent plaintiff American Home Assurance Company in the above captioned matter. We write respectfully to request a sixty (60) day adjournment of the Initial Pretrial Conference from Monday, July 14, 2008 at 4:30 p.m. as currently scheduled to Monday, September 15, 2008. This is the first such request.

This case concerns alleged salt-water damage to containerized shipment of Frigidaire brand window air conditioners shipped from China to New York aboard the vessel M/V FEI HE in May 2006. Plaintiff alleges damages of approximately \$30,000. The United States Carriage of Goods by Sea Act, 46 U.S.C. App. §1300 et seq. applies. This Court has jurisdiction pursuant to 28 U.S.C. §1333.

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We filed suit against the vessel M/V FEI HEI, in rem, and against the bill of lading issuer, Hanjin Shipping Co. (Hanjin), and vessel owner, COSCO Container Lines Co. Ltd. (COSCO), in personam. Hanjin kindly waived service of process and will respond to the Complaint by July 29, 2008.

We offered a waiver of service of process to COSCO through its local United States affiliate corporation, COSCO Container Lines Americas, Inc. located in Secaucus, New Jersey, but same was refused. COSCO is a Chinese corporation, which requires service through the Hague Service Convention through diplomatic channels. ~~This will delay COSCO's appearance by approximately 60 to 120 days.~~

In light of the modest amount in controversy and the foreign service requirements, we respectfully request a sixty (60) day adjournment of the Initial Pretrial Conference from Monday, July 14, 2008 to Monday, September 15, 2008.

We thank the Court for this opportunity and its consideration.

Respectfully submitted,

KENNEDY LILLIS SCHMIDT & ENGLISH

By:


Thomas M. Grasso


Plaintiff's request is granted. The conference originally scheduled for Monday, July 14, 2008 is adjourned to Monday, September 15, 2008 at 4:30 p.m.

TMG/

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SO ORDERED:

Dated: New York, New York
July 8, 2008


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